

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.

Plaintiff,

v.

MICROSOFT CORPORATION

Defendant.

Case No. 7:24-cv-00338-ADA

**JURY TRIAL DEMANDED**

**JOINT MOTION FOR ENTRY OF SCHEDULING ORDER**

Pursuant to OGP § II(3) and in view of the Notice of Extension (Dkt. 24), Plaintiff VirtaMove Corp. and Defendant Microsoft Corporation hereby jointly move for the Court to enter the proposed Scheduling Order filed herewith to govern this case.

Counsel for the parties have conferred and all parties agree to the schedule. Accordingly, the parties request that the Court grant the motion and enter the attached Proposed Order.

Dated: April 25, 2025

Respectfully submitted,

By: /s/ Peter Tong

/s/ John Guaragna

Reza Mirzaie (CA SBN 246953)  
rmirzaie@raklaw.com  
Marc A. Fenster (CA SBN 181067)  
mfenster@raklaw.com  
Neil A. Rubin (CA SBN 250761)  
nrubin@raklaw.com  
James A. Milkey (CA SBN 281283)  
jmilkey@raklaw.com  
Jacob Buczko (CA SBN 269408)  
jbuczko@raklaw.com  
James Tsuei (CA SBN 285530)  
jtsuei@raklaw.com

John M. Guaragna  
Texas Bar No. 24043308  
Zachary Loney  
Texas Bar No. 24092714  
Michael Saulnier  
Texas Bar No. 24131647  
**DLA PIPER LLP (US)**  
303 Colorado St., Suite 3000  
Austin, TX 78701  
Tel: (512) 457-7125  
Fax: (512) 457-7001  
[john.guaragna@us.dlapiper.com](mailto:john.guaragna@us.dlapiper.com)

Christian W. Conkle (CA SBN 306374)  
cconkle@raklaw.com  
Jonathan Ma (CA SBN 312773)  
jma@raklaw.com  
Daniel B. Kolko (CA SBN 341680)  
dkolko@raklaw.com  
**RUSS AUGUST & KABAT**  
12424 Wilshire Boulevard, 12th Floor  
Los Angeles, CA 90025  
Telephone: (310) 826-7474

Qi (Peter) Tong (TX SBN 24119042)  
**RUSS AUGUST & KABAT**  
8080 N. Central Expy., Suite 1503  
Dallas, TX 75206  
Telephone: (310) 826-7474

*Attorneys for Plaintiff VirtaMove, Corp.*

[zachary.loney@us.dlapiper.com](mailto:zachary.loney@us.dlapiper.com)  
[michael.saulnier@us.dlapiper.com](mailto:michael.saulnier@us.dlapiper.com)

Ahimsa E. Hodari  
Texas Bar No. 24132415  
**DLA PIPER LLP (US)**  
845 Texas Avenue, Suite 3800  
Houston, TX 77002  
Tel: 713.425.8400  
Fax: 713.425.8401  
[ahimsa.hodari@us.dlapiper.com](mailto:ahimsa.hodari@us.dlapiper.com)

*Attorneys for Defendant Microsoft Corporation*

**CERTIFICATE OF SERVICE**

I certify that on April 25, 2025, a true and correct copy of the foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

/s/ Peter Tong  
Peter Tong